

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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U.S. DISTRICT COURT  
DISTRICT OF MASS

KINGVISION PAY-PER-VIEW CORP., LTD. )

Plaintiff, )

Civil Action No. 05-10262-RGS

v. )

PAUL HAMMOND and ARIES TAVERN INC., )

d/b/a PAUL'S IN THE SQUARE )

Defendants. )

**ANSWER**

1. Admitted.

2. Admitted.

3. Admitted.

4. Defendants are without sufficient knowledge to either admit or deny the allegations

contained herein.

5. Denied.

6. Denied.

7. Defendants are without sufficient knowledge to either admit or deny the allegations

contained herein.

8. Defendants are without sufficient knowledge to either admit or deny the allegations

contained herein.

9. Defendants are without sufficient knowledge to either admit or deny the allegations

contained herein.

10. Defendants are without sufficient knowledge to either admit or deny the allegations

contained herein.

11. Defendants are without sufficient knowledge to either admit or deny the allegations contained herein.

12. Denied.

13. Defendants are without sufficient knowledge to either admit or deny the allegations contained herein.

14. Denied.

15. Denied.

16. Denied.

17. Denied.

18. Denied.

#### **COUNT I**

19. Defendants hereby incorporate their responses set forth in paragraphs 1 through 18.

20. Denied.

21. Denied.

22. Denied.

23. Denied.

24. Denied.

25. Denied

#### **AFFIRMATIVE DEFENSES**

##### **FIRST AFFIRMATIVE DEFENSE**

The defendant committed no willful interception, reception nor infringement.

##### **SECOND AFFIRMATIVE DEFENSE**

The plaintiff's remedies are barred by the doctrine of unclean hands.

THIRD AFFIRMATIVE DEFENSE

The plaintiff's remedies are barred by the doctrine of estoppel.

FOURTH AFFIRMATIVE DEFENSE

The plaintiff is barred by its bad faith and unreasonableness in dealing with the defendant.

FIFTH AFFIRMATIVE DEFENSE

The plaintiff is barred by laches.

SIXTH AFFIRMATIVE DEFENSE

Defendant Paul Hammond is not individually liable for the actions of the corporate defendant.

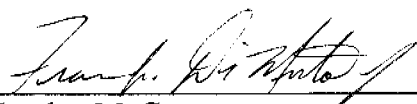
WHEREFORE, the defendants request that the Complaint be dismissed and the defendant be awarded costs, attorneys fees and other relief deemed just.

**DEFENDANTS REQUEST TRIAL BY JURY**

By their attorneys,

DiMENTO & SULLIVAN

March 9, 2005

  
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I HEREBY CERTIFY THAT A TRUE COPY OF THE ABOVE  
DOCUMENT WAS SERVED UPON MY CLIENT/ATTORNEY OF RECORD  
FOR EACH OTHER PARTY BY WAIVER TO ON 3-9-05

